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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 21-00490 SI
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	SETTING CHANGE OF PLEA HEARING
v.)	
)	
MOHAMMED NURU,)	
)	
Defendant.)	

The parties have reached an agreement to resolve the charges against the defendant. An executed plea agreement, attached as Exhibit 1, reflects the parties' agreement. In order to expedite this matter, and in light of the current COVID-19 pandemic, the parties are requesting that a change of plea hearing be held by videoconference on January 6, 2022, or as soon thereafter as convenient for the Court.¹

The defendant voluntarily wishes to appear by video conference, has been advised by counsel, and understands the following: (1) he has the right under the Constitution and the Federal Rules of Criminal Procedure to be present at the proceeding; and (2) he understands that video conferencing is

¹ The government has filed a notice of related case for this matter as to *U.S. v. Bovis*, No. CR 20-00204 WHO, *U.S. v. Wong*, No. CR 20-00257 WHO, *U.S. v. Hernandez*, No. CR 20-00353 WHO, *U.S. v. Zuniga*, No. CR 21-00096 WHO, *U.S. v. Varela, et al.*, No. CR 21-00192 WHO, and *U.S. v. Giusti*, No. 21-00294 WHO. Subject to the Court's discretion, the requested date above reflects the first available date on Judge Orrick's criminal calendar.

1 the projection of live camera video and audio between participants.

2 SO STIPULATED.

3
4 DATED: December 17, 2021

STEPHANIE M. HINDS
Acting United States Attorney

5
6 _____
/s/
7 SCOTT D. JOINER
Assistant United States Attorney

8
9 DATED: December 17, 2021

10 _____
/s/
ISMAIL RAMSEY
Ramsey & Ehrlich LLP
Attorneys for Defendant

11
12
13 **[PROPOSED] ORDER**

14 Pursuant to stipulation, the above-captioned matter will be set for a change of plea hearing on

15 _____ at _____. The parties will appear by videoconference.

16 IT IS SO ORDERED.

17
18 DATED: _____

19 _____
HON.
UNITED STATES DISTRICT JUDGE